

# **EXHIBIT 1**

9/26/2024

Richard Kadrey, et al. v. Meta Platforms, Inc. Eleonora Presani, Ph.D.  
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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

_____	)	Case No.
RICHARD KADREY, et al.,	)	
Individual and Representative	)	
	)	
Plaintiffs,	)	3:23-cv-03417-VC
	)	
- against -	)	
	)	
META PLATFORMS, Inc.,	)	
	)	
Defendant.	)	
_____	)	

\* \* H I G H L Y C O N F I D E N T I A L \* \*  
\* \* A T T O R N E Y S ' E Y E S O N L Y \* \*

VIDEO-RECORDED DEPOSITION  
OF  
ELEONORA PRESANI, Ph.D.  
September 26, 2024

Reported Stenographically by:  
ANNETTE ARLEQUIN, CCR/CSR, RPR, CRR, RSA

\_\_\_\_\_  
DIGITAL EVIDENCE GROUP  
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(202) 232-0646

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1 A. It's 1839 21st Road, Astoria, New  
2 York.

3 Q. Great. Thank you.

4 Have you had your deposition taken  
5 before?

6 A. No.

7 Q. And where are you presently  
8 employed?

9 A. At Meta.

10 Q. And what is your title at Meta?

11 A. Program manager.

12 Q. Is there a specific department or  
13 division you work for at Meta?

14 A. Currently?

15 Q. Yes, currently.

16 A. I work for the organization called  
17 gen AI, for generative AI.

18 Q. Is there a specific division within  
19 the generative AI organization that you work for?

20 A. I move a little bit around. Mostly  
21 in the recent months I've been with the trust and  
22 safety.

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1 services, right?

2 MS. DUNNING: Object to the form.

3 A. No, I just mean that they are  
4 different from the work that I was doing when I  
5 was at FAIR.

6 Q. So, like, for example, I believe  
7 Instagram recently released an influencer-type  
8 chatbot.

9 Were you involved in that program?

10 A. No, I wasn't.

11 Q. But would that be the type of work  
12 that you would be doing or might be involved in?

13 MS. DUNNING: Object to the form.

14 A. I'm not doing that. Yeah.

15 Q. Now as part of your responsibilities  
16 at Meta, is it part of your role to evaluate  
17 datasets that Meta is using to develop its  
18 generative AI models?

19 MS. DUNNING: Object to the form.

20 A. No, it's not.

21 Q. Do you have any input in the  
22 datasets that Meta is using to develop its LLMs?

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1 A. No.

2 Q. Do you have any approval power over  
3 any of the datasets that Meta -- strike that.

4 Do you have any approval power over  
5 which datasets are being used to train LLMs?

6 MS. DUNNING: Object to the form.

7 A. No, I don't.

8 Q. Has anyone ever come to you for  
9 approval about the use of any specific datasets  
10 for use in any of Meta's LLMs?

11 A. No.

12 Q. So generally at what stage of the  
13 lifecycle of the development of an LLM do you get  
14 involved?

15 MS. DUNNING: Object to the form.

16 A. Are you talking now or a different  
17 time?

18 Q. Yeah, let's talk about now.

19 A. There isn't really a standard. It  
20 depends on the project, when usually it's the  
21 project leader that requests program manager  
22 support.

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1 had with Mr. Martinet?

2 A. No, not the only one.

3 Q. Do you remember approximately how  
4 many exchanges you've had with Mr. Martinet?

5 A. I cannot really say a number, but I  
6 think we had sporadic contacts for maybe a couple  
7 of months.

8 Q. [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

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1 much, but it's possible, I guess.

2

█

█

█

█

█

█

█

10 Q. Do you know if any similar

11 discussions about -- strike that.

12 Do you know if there were any  
13 discussions involving you about using the dataset  
14 known as Books3 for training any Meta models?  
15 That did not involve lawyers?

16 A. I don't remember, but it's possible.

17 MS. DUNNING: Counsel, we've been  
18 going an hour and a half. If you're going to  
19 move on to Books3, I think we may need to  
20 take a break.

21 MR. YOUNG: I actually think I'm  
22 about to -- well, I got a couple more

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1       were talking about Books3.

2                   Do you remember that?

3           A.     I remember you brought it up, yes.

4           Q.     Do you know what Books3 is?

5           A.     Not specifically.

6           Q.     Do you understand it to be a

7       database?

8           A.     I thought it was a dataset, to be  
9       honest.

10          Q.     A dataset that was used to train  
11       Meta's models?

12                   MS. DUNNING: Object to the form.

13          A.     I don't know.

14          Q.     Was today the first time you ever  
15       heard about Books3?

16          A.     No.

17          Q.     How -- well, never mind.

18                   Let me rephrase that.

19                   Without discussing any  
20       communications you may have had with lawyers, how  
21       did you first come to know about the dataset  
22       known as Books3?



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1 MS. DUNNING: Object to the form.

2 A. I wouldn't say that I got to know  
3 about it, but I heard -- I heard that -- it being  
4 mentioned in various context, within FAIR  
5 especially.

6 Q. Have you ever examined what is  
7 contained in Books3?

8 A. No.

9 Q. Do you have an understanding of what  
10 is contained in Books3?

11 A. No.

12 Q. Have you ever had any discussions  
13 with anyone at Meta who is not a lawyer about  
14 Books3?

15 A. I don't remember having  
16 conversations specifically about that.

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 Q. Do you know an individual named  
22 Nikolay Bashlykov?

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1 we've been discussing, does -- to the best of  
2 your understanding, did any of the discussion in  
3 this message chain refer to a Llama model?

4 A. No. That was before Llama was even  
5 existing.

6 MR. YOUNG: Objection to form.

7 BY MS. DUNNING:

8 Q. To your understanding, did any of  
9 the discussion in Exhibit 38 pertain to Meta AI?

10 A. Oh, no.

11 MR. YOUNG: Objection to form.

12 BY MS. DUNNING:

13 Q. I'm reading from line 217:12 of the  
14 LiveNote.

█ [REDACTED] [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED] [REDACTED]  
█ [REDACTED] [REDACTED]  
█ [REDACTED] [REDACTED]

21 Do you know whether you have  
22 communicated with anyone within Meta about

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1

2

MR. YOUNG: Objection. Form.

3

A. I remember having conversations

4

about it. I don't remember the medium we used.

5

Q. Who were those conversations with?

6

A. With Melanie Kambadur.

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21 involved in any conversation around the training  
22 for Llama.

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1 C E R T I F I C A T E

2 STATE OF NEW YORK )

3 : ss.

4 COUNTY OF NEW YORK )

5 I, ANNETTE ARLEQUIN, a Notary Public  
6 within and for the State of New York, do  
7 hereby certify:

8 That ELEONORA PRESANI, Ph.D., whose  
9 deposition is hereinbefore set forth, was  
10 duly sworn by me, and that the transcript of  
11 such depositions is a true record of the  
12 testimony given by such witness.

13 I further certify that I am not  
14 related to any of the parties to this action  
15 by blood or marriage; and that I am in no  
16 way interested in the outcome of this  
17 matter.

18 IN WITNESS WHEREOF, I have hereunto  
19 set my hand this 27th day of September 2024.

20

21

  
\_\_\_\_\_

22

ANNETTE ARLEQUIN, CCR #30XI00145000